

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X Case No.: 1:20-cv-6569 (PAC)
JANE DOE,

Plaintiff,

- against -

CUBA GOODING, JR.,

Defendant.

-----X

**DECLARATION OF COUNSEL
IN SUPPORT OF
REQUEST FOR CLERK'S
CERTIFICATE OF DEFAULT**

CASIMIR WOLNOWSKI, declares, pursuant to 28 U.S.C. § 1746, and subject to the penalties of perjury, that the following is true and correct:

1. I am a member of the Bar of this Court and am senior managing counsel at Nisar Law Group, P.C., attorneys for Plaintiff in the above-entitled action. As such, I am familiar with all of the facts and circumstances in this action.
2. I make this declaration in support of the Request for Clerk's Certificate of Default, made pursuant to Rule 55(a) of the Federal Rules of Civil Procedure and Local Civil Rule 55.1 of the Local Rules of the U.S. District Court for the Southern District of New York, requesting an entry of a Certificate of Default Judgment against Defendant CUBA GOODING, JR. ("Defendant").
3. I affirm that the party against whom the judgment is sought is not an infant or incompetent person, is not in the military service, was properly served under Fed. R. C. P. 4 and proof of service having been filed with the court, and has defaulted in appearance in the above-captioned action.
4. Plaintiff commenced this action on August 18, 2020, by the filing of the Complaint (ECF #1.) On August 20, 2020, a Summons was issued as to Defendant (ECF #6.)

5. Copies of the filed Complaint and issued Summons were duly served on Defendant. Proof of said service was filed with the Court on April 23, 2021 (ECF #11.)
6. Defendant has not answered or otherwise responded to the Complaint and the time for Defendant to answer the Complaint or otherwise respond has since expired. See Fed. R. Civ. P. 12.
7. Accordingly, due to Defendant's default, Plaintiff respectfully requests entry of the Clerk's certificate of default so that she may move for a Default Judgment against Defendant. A Proposed Clerk's Certificate of Default has been filed on ECF.

Dated: New York, New York
May 14, 2021

NISAR LAW GROUP, P.C.



By: _____

Casimir Wolnowski, Esq.
Attorneys for Plaintiff
Attorneys for Plaintiff
60 East 42nd Street, Suite 4600
New York, NY 10165
Direct: (646) 889-1007
Fax: (516) 604-0157
Email: cwolnowski@nisarlaw.com